

REED SMITH LLP  
David A. Kochman  
Evan K. Farber  
599 Lexington Avenue  
New York, NY 10022  
(212) 521-5400 (P)  
(212-521-5450 (F)

*Attorneys for Plaintiffs  
Long Side Ventures, LLC  
and Sunny Isles Ventures, LLC*

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

LONG SIDE VENTURES, LLC and SUNNY  
ISLES VENTURES, LLC,

Plaintiffs,

- v -

ADARNA ENERGY CORPORATION f/k/a  
ECOSYSTEM CORPORATION, GREENSHIFT  
CORPORATION, and MINORITY INTEREST  
FUND (II), LLC,

Defendants.

Case No. 12 Civ. 6836 (LTS)(MHD)

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and the applicable local and individual rules of this Court, and upon the accompanying memorandum of law, affidavit of Evan K. Farber, dated September 18, 2013, and affidavit of Benjamin Kaplan, dated September 19, 2013, plaintiffs Long Side Ventures, LLC and Sunny Isles Ventures, LLC, by their attorneys, Reed Smith LLP, hereby move for a judgment finding defendants Adarna Energy Corporation f/k/a Ecosystem Corporation, Greenshift Corporation, and Minority Interest Fund (II), LLC liable for breach of contract on the First through Eighth Claims for Relief in the Complaint in the

above-captioned action, and awarding a judgment in the aggregate amount of \$766,127.79, plus contractual interest, pre- and post-judgment interest and costs.

Dated: September 19, 2013

By: /s/ David A. Kochman  
David A. Kochman (DK 1809)  
Evan K. Farber (EF 1049)  
Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022  
Tel: (212) 521-5400  
Fax: (212) 521-5450  
*Attorneys for Plaintiffs*